

RECEIVED
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

2005 NOV -3 P 1:43

JOE T. SMITH,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,
INC.; AMERICAN GENERAL
CORPORATION; AMERICAN GENERAL
FINANCE, INC.; AMERICAN GENERAL
FINANCE CORPORATION; MERIT LIFE
INSURANCE COMPANY; KIMBERLY
SINGLETON; PAT PORTER; ROY T.
EVANS; and Fictitious Defendants "A", "B",
and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused the
injuries and damages to the Plaintiff, all of
whose true and correct names are unknown
to Plaintiff at this time, but will be substituted
by amendment when ascertained,

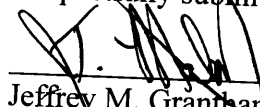
Defendants.

CIVIL ACTION NO.: 2:05-cv-1065-M

SPECIAL APPEARANCE - JOINDER AND CONSENT TO REMOVAL

Defendants American International Group, Inc. ("AIG") and American General Corporation ("AGC"), making a special appearance by and through their counsel of record, appear solely for the purpose of joining in and consenting to the removal of this action to the United States District Court for the Middle District of Alabama, Northern Division. In so doing, AIG and AGC do not waive and specifically preserve their defense of lack of personal jurisdiction, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Respectfully submitted,



Jeffrey M. Grantham (ASB-4866-M66J)

Thomas J. Butler (ASB-7790-T75T)

John Thomas A. Malatesta, III (ASB-4646-O70M)

Attorneys for Defendants American International
Group, Inc. and American General Corporation

OF COUNSEL:

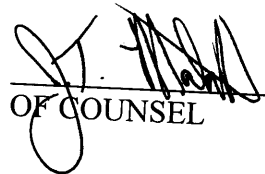
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205-254-1000
205-254-1999 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by U. S. Mail, postage prepaid, on this the 3rd day of November, 2005:

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